

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**SECURITIES AND EXCHANGE  
COMMISSION,**

*Plaintiff,*

**vs.**

**VUUZLE MEDIA CORP.,  
RONALD SHANE FLYNN, AND  
RICHARD MARCHITTO,**

*Defendants.*

**Civil Action No. 2:21-cv-1226 (KSH)  
(CLW)**

**PLAINTIFF'S MOTION FOR ENTRY OF PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and Local Civil Rule 5.3, Plaintiff U.S. Securities and Exchange Commission (the "SEC") respectfully moves the Court for entry of the protective order in the form filed herewith as a proposed Order.

As set forth in the memorandum of law and declaration filed herewith, a protective order in the form submitted by the SEC should be entered.

Dated: July 16, 2021

Respectfully submitted,

*/s/ Devon Staren*

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### **CERTIFICATE OF SERVICE**

I hereby certify that on July 16, 2021, I served a copy of the foregoing upon all counsel of record using this Court's ECF system, and upon Defendant Flynn using the email rflynn48@gmail.com.

*/s/ Devon Staren*

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Counsel for Plaintiff